

REMARKS

Reconsideration of the present application is respectfully requested in view of the following remarks. Prior to entry of this response, claims 1-96 were pending in the application, of which Claims 1, 25, 49, and 73 are independent. In the Office Action mailed January 4, 2005 ("OA")¹, claims 1-96 were rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 6,253,234 to *Hunt*, in view of U.S. Patent No. 6,437,406 to *Coile*. By this Amendment, Applicant amends claims 1, 4, 6, 16, 21, 24, 25, 28, 30, 40, 45, 48, 49, 52, 54, 64, 69, 72, 73, 76, 78, 88, 93, and 96, and cancels claims 14, 15, 38, 39, 62, 63, 86, and 87. The amendment of claims 4, 6, 16, 21, 24, 28, 30, 40, 45, 48, 52, 54, 64, 69, 72, 76, 78, 88, 93, and 96 serves to correct typographical and other minor errors. The amendment of independent claims 1, 25, 49, and 73 serves to incorporate the elements of canceled claims 14-15, 38-39, 62-63, and 86-87. Following this response, claims 1-13, 16-37, 40-61, 64-85, and 88-96 remain in this application. In view of the aforementioned amendments and the following remarks, Applicant respectfully traverses the Examiner's rejections of the claims under 35 U.S.C. § 103(a).

Rejection of Claims 1-96 Under 35 U.S.C. § 103(a)

The Examiner rejected Claims 1-96 under 35 U.S.C. § 103(a) as being unpatentable over *Hunt* in view of *Coile*. Applicant respectfully traverses this rejection.

¹ The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Office Action.

To establish a *prima facie* case of obviousness, three basic criteria must be met.

First, the prior art reference as modified must teach or suggest all the claim elements.

(See M.P.E.P. § 2143.03 (8th ed. 2001)). Second, there must be some suggestion or motivation, either in the reference or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or combine the reference teachings.

(See M.P.E.P. § 2143 (8th ed. 2001)). Third a reasonable expectation of success must exist. Moreover, each of these requirement must “be found in the prior art, and not be based on applicant’s disclosure.” (M.P.E.P. § 2143.03 (8th ed. 2001)).

Amended claim 25 is patentably distinguishable over the cited art in that amended claim 25 recites, for example, “identifying a first reference within a javascript construct, wherein the javascript construct, when performed, would force a page reload by the browser; inserting a first javascript function into the modified remote page for modifying references; inserting a call to the first javascript function into the javascript construct, wherein the first reference is encapsulated in the function call.” Amended Claims 1, 49, and 73 include similar recitations.

In contrast, *Hunt* at least does not disclose the aforementioned recitation. For example, *Hunt* merely discloses that “a proxy server redirects or reroutes a request from a specific host name or IP address or another browser... where the proxy server acts as a surrogate or a conduit...” (*Hunt* col. 6, lines 17-22). *Hunt* further discloses that “[i]n an intranet with more than one proxy... Some coordination between the proxies may be required to keep the cache contents current for both proxies...” (*Hunt* col. 8, lines 15-24). *Hunt* does not constitute a teaching of “identifying a first reference within a javascript construct, wherein the javascript construct, when performed, would force a

page reload by the browser; inserting a first javascript function into the modified remote page for modifying references; inserting a call to the first javascript function into the javascript construct, wherein the first reference is encapsulated in the function call,” as recited in amended claim 25.

Applicant respectfully submits that *Coile* is not sufficient to overcome the deficiencies of *Hunt*. For example, *Coile* discloses “monitoring a communication packet on a network at a proxy machine... the proxy determines whether to intercept the communication packet based on whether the communication packet destination address... correspond to a protected destination address... stored in a proxy list” (*Coile* col. 3, lines 42-52). *Coile* does not constitute a teaching of “identifying a first reference within a javascript construct, wherein the javascript construct, when performed, would force a page reload by the browser; inserting a first javascript function into the modified remote page for modifying references; inserting a call to the first javascript function into the javascript construct, wherein the first reference is encapsulated in the function call,” as recited in amended claim 25.

Applicant notes that the Examiner mentioned U.S. Patent No. 5,835,718 to *Blewett* (OA pg. 3, ¶ 7), but did not use the *Blewett* reference to reject claim 25. Applicant respectfully submits that *Blewett* is not sufficient to overcome the deficiencies of *Hunt*. For example, *Blewett* discloses “determin[ing] on the fly if the actual URL is remote and if it is to be rewritten. All remote URL’s may be selected for rewriting, or selective groups may be selected for rewriting. The selection may be based upon the remote domain name which can be compared with a list of remote domain names that are to be tracked as well as other comparison criteria” (*Blewett* col. 4, lines 21-27).

Blewett does not constitute a teaching of "identifying a first reference within a javascript construct, wherein the javascript construct, when performed, would force a page reload by the browser; inserting a first javascript function into the modified remote page for modifying references; inserting a call to the first javascript function into the javascript construct, wherein the first reference is encapsulated in the function call," as recited in amended claim 25.

Therefore, *Hunt* in view of *Coile* or *Blewett* does not anticipate the claimed invention because the references, either taken individually or in combination, at least do not disclose the aforementioned recitation of amended Claim 25. Amended claims 1, 49, and 73 include similar recitations. Accordingly, independent claims 1, 25, 49, and 73 patentably distinguishes the present invention over the cited art, and Applicant respectfully requests withdrawal of this rejection of claims 1, 25, 49, and 73.

Dependent claims 2-13 and 16-24, 26-37 and 40-48, 50-61 and 64-72, and 74-85 and 88-96 are also allowable not only for the reasons stated above with regard to their respective allowable base claims 1, 25, 49, and 73, but also for their own additional features that distinguish them from *Hunt* in view of *Coile* or *Blewett*. Accordingly, Applicant respectfully requests withdrawal of this rejection of dependent claims 2-13, 16-24, 26-37, 40-48, 50-61, 64-72, 74-85, and 88-96.

Conclusion

In view of the foregoing remarks, Applicant respectfully requests the reconsideration and reexamination of this application and the timely allowance of the pending claims. The preceding arguments are based only on the arguments in the Office Action, and therefore do not address patentable aspects of the invention that were not addressed by the Examiner in the Office Action. The claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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